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JUL 16 2008

CHAMBERS OF  
 WILLIAM H. PAULEY  
 U.S.D.J.

July 16, 2008

**BY HAND**

Hon. William H. Pauley, III  
 United States District Judge  
 Southern District of New York  
 500 Pearl St., Room 2210  
 New York, NY 10007

**PRO EMBODISED**

Re: *The Doe Run Resources Corporation v. BHL Resources Limited;*  
Case No. 08-cv-1956 (WHP)

Dear Judge Pauley:

This firm was retained yesterday to act as counsel for defendant BHL Resources Limited (“BHL”) in the above-referenced case, and will be substituting for BHL’s previous counsel. We were first consulted regarding the retention Monday. We write both to inform the Court of that substitution and regarding the time for BHL to answer, move or otherwise respond to the complaint in this matter.

On July 9, 2006, BHL’s previous counsel, Mark S. McNeill of Shearman & Sterling, wrote to Your Honor and informed the Court that BHL wished to file a motion to dismiss the complaint pursuant to Rule 12(b)(5), and outlined the general grounds therefore. Mr. McNeill requested a pre-motion conference. The Court thereafter scheduled a pre-motion conference for August 8, 2008. The case management conference is also scheduled for that date. The Court also approved BHL’s request, with plaintiff’s consent by stipulation, to extend the date for BHL to answer, move or otherwise respond to the complaint until July 17, 2008. The request followed an earlier request by plaintiff, submitted June 30, 2008, to adjourn the case management conference and a request that same day by defendant to extend the time to answer the complaint by three days and a subsequent stipulation extending the time to answer by two weeks.

At the present time, while we are still familiarizing ourselves with the facts of this case, based on the limited knowledge in our possession at this time we intend on behalf of BHL to submit the Rule 12(b)(5) motion outlined by Mr. McNeill, and will be prepared to address that motion fully at the pre-motion conference before Your Honor on

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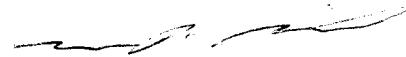
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August 8. However, in the interim, given the imminent August 8 conference, it does not appear to be productive for BHL to be required to submit an answer or otherwise respond to the complaint as scheduled for July 17, 2008. Indeed, because of the nature of BHL's proposed motion that issue has not been joined at all as of yet, an answer in advance of this motion also seems premature.

Accordingly, we request that the date for BHL to answer, move or otherwise respond to the complaint in this matter be extended to a date to be set by the Court at the August 8, 2008 conference. BHL will at that time be prepared to submit a motion or answer, as the Court directs, on whatever prompt schedule the Court decides.

Counsel for BHL has conferred with counsel for plaintiff in this action regarding BHL's proposal, and plaintiff does not agree.

Respectfully submitted,



Eric P. Heichel

cc: Joshua Reid Weiss, Esq. (by e-mail)  
Mark S. McNeill, Esq. (by e-mail)  
Eric R. Levine, Esq. (by hand)

*Application granted.*  
SO ORDERED:

  
WILLIAM H. PAULEY III U.S.D.J.

*7/18/08*